## UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
Plaintiff,	)	
	)	
	)	
VS.	)	No. 08 CR 109
	)	Honorable Milton I. Shadui
	)	
CALVIN LOCKHART,	)	
Defendant.	)	

## DEFENDANT CALVIN LOCKHART'S STATEMENT OF COMPLIANCE WITH RULE 16.1

Now comes Defendant Calvin Lockhart, by his attorney, Linda Amdur, pursuant to Local Criminal Rule 16.1 and states as follows:

- 1. The government made delivery of its Rule 16.1 material to defense counsel on March 14, 2008.
  - 2. The delivery was from Assistant United States Attorney Shoshana Gillers.
- 3. The following items were delivered pursuant to Local Criminal Rule 16.1 and Rule 16 of the Federal Rules of Criminal Procedure:
  - draft transcripts of recorded conversations including those of defendant
  - grand jury exhibits
  - grand jury transcripts
  - reports of investigation
  - bank records: Fifth Third Bank, Associated Bank, AMCORE Bank, Northwest Bank,
    MB Financial Bank, Blackhawk State Bank, Austin Bank, Chase Bank, Charter One

Bank, TCF Bank, Washington Mutual Bank

- criminal history of defendant
- CD containing recorded conversations of defendant

Based upon the above Rule 16.1 material provided, Defendant Lockhart files the accompanying pretrial motions, and makes specific requests contained within those motions regarding notice of Rule 404(b) evidence, and Brady and Giglio material.

Respectfully submitted,

S/Linda Amdur Linda Amdur, Attorney for Defendant Calvin Lockhart

Linda Amdur 53 West Jackson Blvd. Suite 1503 Chicago, IL 60604 (312) 347-9999

## UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

UNITED STATES OF AMERICA,	)
Plaintiff,	)
	)
	)
VS.	) No. 08 CR 109
	) Honorable Milton I. Shadui
	)
CALVIN LOCKHART,	)
Defendant.	)

## **CERTIFICATE OF SERVICE**

The undersigned attorney hereby certifies that in accordance with Fed. R. Crim. P. 49, Fed. R. Civ. P. 5, LR 5.5, and the General Order on Electronic case Filing (ECF), Defendant Calvin Lockhart's Statement of Compliance With Rule 16.1 was filed and served pursuant to the district court's ECF system as to ECF filers on March 28, 2008.

Respectfully submitted,

S/Linda Amdur Linda Amdur, Attorney for Defendant Calvin Lockhart

Linda Amdur 53 West Jackson Blvd. Suite 1503 Chicago, IL 60604 (312) 347-9999